

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:)	Chapter 11
)	
Circuit City Stores, Inc., <u>et al.</u> ,)	Case No. 08-35653
)	
Debtors.)	(Jointly Administered)

MOTION FOR ADMISSION
PRO HAC VICE OF PATRICK M. BIRNEY

Tara L. Elgie (“Movant”) hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Patrick M. Birney (“Mr. Birney”), an attorney with the law firm of Robinson & Cole, to appear pro hac vice in the referenced bankruptcy cases before the United States Bankruptcy Court for the Eastern District of Virginia (the “Bankruptcy Case”) to represent Schimenti Construction Company, LLC and in support of this Motion, the Movant states as follows:

1. Movant is a member in good standing of the Bar of the Supreme Court of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. Mr. Birney is a member in good standing of the State Bar of Connecticut and is an attorney admitted to practice before the United States District Court for the District of

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Connecticut. There are no disciplinary proceedings pending against Mr. Birney in any jurisdiction in which he is admitted to practice.

3. Movant requests that this Court authorize Mr. Birney to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of Schimenti Construction Company, LLC.

4. Movant shall serve as co-counsel with Mr. Birney in the Bankruptcy Case (and related proceedings).

5. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) to counsel for the Debtors, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Patrick M. Birney to appear pro hac vice in the Bankruptcy Case in substantially the same form as Exhibit A attached hereto and grant such other and further relief as is just.

/s/ Tara L. Elgie
Movant

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Counsel for Schimenti Construction Company, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of January 2009, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Bankruptcy Court for the Eastern District of Virginia, Richmond Division, using the CM/ECF system, which thereby caused the above to be served electronically on all registered users of the ECF system that have filed notices of appearance in this matter, and mailed, by U.S. Mail, first class, postage prepaid, to all persons appearing below:

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